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Bureau of Land Management, Western Oregon Plan Revisions  
P.O. Box 2965, Portland, OR 97208

CC: Oregon Congressional delegation

Re: BLM Western Oregon Plan Revisions

Dear BLM,

**With regards to the BLM Western Oregon Plan Revisions, I am writing to oppose the BLM's preferred alternative #1, and support the No Action alternative.**

**A better plan is to create a collaborative approach to management which involves local counties, timber industry, environmental organizations, the biomass and biofuels industry, the BLM, and the Oregon Congressional delegation.**

First, let me outline my reasons for opposition to Alternative #1.

Increased clear cuts on BLM land will substantially reduce complex forest habitat, which has a number of deleterious impacts. First, the reduction in old growth and complex forest habitat creates additional risk related to preservation of the endangered spotted owl and marbled murrelet. Second, the reduction in overall area and increased fragmentation of old growth and complex habitat increases the risk that in the future animal and plant species which depend on the complex nature of an old growth forest will be endangered, thus requiring draconian restoration action as has occurred with the spotted owl. The federal government, as caretaker of virtually all of the little remaining old growth in the US, has a special responsibility to protect old growth trees and habitat for future generations and species preservation. We cannot fail in this responsibility.

Decreasing riparian management zones is also problematic. Substantive riparian zones are required to prevent sedimentation and water temperature increases, conditions which lead to destruction and quality reduction of fish habitat. As well, reduction of the riparian buffer zones to that proposed in Alternative #1 essentially creates thin lines of vegetation along streams, substantially detracting from the stream as a recreational and heritage resource.

Thus, Alternative #1 substantially reduces the value of the areas in question for habitat, recreation and human enjoyment, and future scientific study. I believe that these items have not been fully accounted for in the BLM study.

In summary, given the choices in the BLM document, I support No Action because of the environment harm which will occur with other choices.

After protection of old growth and riparian areas, I support collaborative management solutions to increase value (revenue and other value contributors such as species preservation, public enjoyment, and heritage) while reducing fire hazard in appropriate ways.

In my position as Director and VP of Trillium FiberFuels, Inc, a Corvallis based cellulosic alternative energy company, it is clear that both new business models and new technologies need to be created (and can be created) to enable additional value from the forest resources. The state of Oregon provides \$10/wet-ton tax credit to support pulling previously unused biomass from Oregon forests for energy production (for example as wood pellets, electrical cogeneration, or ethanol). This tax credit, in conjunction with higher energy prices, has created a positive environment to create a new forest revenue source, changing the economics of thinning forests for fire prevention and lumber extraction. To effectively manage the forest in this new economic environment, the timber industry, the new Oregon biofuels industry, government land administrators, and environment groups need to agree on a collaborative solution to common concerns which include environmental protection, sustainable economic value creation, public asset preservation, and fire suppression. It may well be that the results require legislative help for implementation, which is why our legislative delegation needs to be involved.

**I'm asking that our legislative delegation and the BLM lead such a discussion to resolve how to manage the BLM lands in question under the WOPR.**

As a final note, while I disagree with the BLM's conclusions with regards to the WOPR, the BLM team deserves high credit for effectively synthesizing and communicating the EIR for public understanding. BLM succeeded in boiling down years of study and work by top scientists into information that is understandable by the layman. I found the informational content on the WOPR web site to be truly exceptional. My thanks to the team!

Sincerely,

Grant Pease, PhD